

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**Joe Alves, individually and on behalf of
all others similarly situated,**

Plaintiff,

v.

Goodyear Tire and Rubber Company,

Defendant.

Case No. 1:22-cv-11820-IT

**MOTION FOR ADMISSION
*PRO HAC VICE***

Pursuant to Rule 85.5.3(e) of the Local Rules for the District of Massachusetts, Joseph P. Guglielmo, hereby moves this Court for an Order admitting Rachel K. Tack to practice *Pro Hac Vice* to appear as counsel for Plaintiff in the above-captioned action. I am in good standing of the bar of the state of Massachusetts and there are no pending disciplinary proceedings against me in any state or federal court. I will be the lawyer of record in this proceeding, responsible for the conduct of the applicant, and present at proceedings in this matter unless excused by the court. I have attached a declaration of Rachel K. Tack in support of this motion pursuant to Local Rule 85.5.3(e)(3).

Dated: November 14, 2022

Respectfully submitted,

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo (BBO #67410)

Carey Alexander (admitted *pro hac vice*)

Ethan S. Binder (admitted *pro hac vice*)

SCOTT+SCOTT ATTORNEYS AT LAW LLP

The Helmsley Building

230 Park Avenue, 17th Floor

New York, NY 10169

Telephone: (212) 223-6444

jguglielmo@scott-scott.com

calexander@scott-scott.com

ebinder@scott-scott.com

CERTIFICATE OF SERVICE

I, Joseph P. Guglielmo, hereby certify that this document, and all accompanying documents being filed in support hereof, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 14, 2022.

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo (BBO #671410)